

Nancy Frankel Pelletier, Esq.

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September 15, 2006

FILE COPY

Andrew M. Fischer, Esq.
Jason and Fischer
47 Winter Street, 4th Floor
Boston, MA 02108

RE: Kenneth and Pamela Price Jean v. City of Ashburnham
Police Department, et. als.
Civil Action No.: 03-12306-MLW

Dear Mr. Fischer:

Attached please find the Defendant, City of Winchendon(sic) Police Department's Answer to Supplemental Interrogatory.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Frankel Pelletier".

Nancy Frankel Pelletier, Esq.

/rjr

Enclosure

cc: Maureen MacDonald
John J. Cloherty, III, Esq.
Andrew J. Gambaccini, Esq.
Regina M. Ryan, Esq.
Mark D. Stern, Esq.

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 03-12306-FDS

KENNETH AND PAMELA PRICE JEAN,)
Plaintiffs)
)
vs.)
)
CITY OF ASHBURNHAM POLICE)
DEPARTMENT, CITY OF WINCHENDON)
POLICE DEPARTMENT,)
ROB HARRINGTON, in his capacity as)
CHIEF OF THE WINCHENDON POLICE)
DEPARTMENT, JACK MURRY, in his capacity)
as CHIEF OF THE ASHBURNHAM POLICE)
DEPARTMENT, TODD C. PARSONS,)
RAYMOND M. ANAIR, ROBERT BRENNON,)
WILLIAM P. GEOFFROY, BRIAN HART,)
KEVIN AHEARN, KEVIN E. WOLSKI)
OFFICER JOHN DOE, OFFICER JOHN DOE,)
Defendants)

DEFENDANT, CITY OF WINCHENDON (SIC) POLICE DEPARTMENT'S,
ANSWER TO SUPPLEMENTAL INTERROGATORY

QUESTION

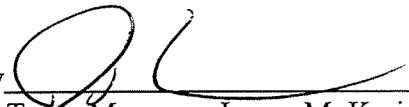
1. Please describe all facts and circumstances regarding the departure of Officer Whitaker from the Winchendon Police force, including in your answer any involvement of either of the plaintiffs regarding actions leading to Officer Whitaker's departure, retirement, removal or resignation as a police officer; the reasons for Officer Whitaker's departure as a police officer; all other facts and circumstances in detail regarding Officer Whitaker's departure as a police officer.

ANSWER

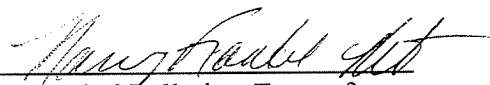
OBJECTION. The defendant, City of Winchendon (sic), objects to this interrogatory on the grounds that it is calculated to annoy and harass the defendant; seeks information neither relevant nor material to this legal action nor reasonably calculated to lead to the discovery of admissible evidence; and exceeds the scope of discovery permitted by Mass. R. Civ. P. 26.

Signed under the pains and penalties of perjury this 12 day of Sept, 2006.

CITY OF WINCHENDON (SIC) POLICE
DEPARTMENT

By 
Its Town Manager, James M. Kreidler, Jr.

AS TO OBJECTIONS:


By 
Nancy Frankel Pelletier, Esq., of
Robinson Donovan, P.C.
1500 Main Street, Suite 1600
Springfield, Massachusetts 01115
Phone (413) 732-2301 Fax (413) 785-4658
BBO No.: 544402

CERTIFICATE OF SERVICE

I, Nancy Frankel Pelletier, Esq., hereby certify that on this 18th day September, 2006, I served a copy of the
above upon the parties in the action by mailing, postage prepaid, to counsel:

Andrew M. Fischer, Esq. Jason & Fischer 47 Winter Street Boston, MA 02108	Mark D. Stern, Esq. 34 Liberty Avenue Somerville, MA 02144
Michael Akerson, Esq. Austin M. Joyce, Esq. Andrew J. Gambaccini, Esq. Reardon, Joyce & Akerson, P.C. 397 Grove Street Worcester, MA 01605	Douglas I. Louison, Esq. Regina M. Ryan, Esq. Merrick, Louison & Costello, LLP 67 Batterymarch Street Boston, MA 02110
John J. Cloherty, III Pierce, David, Perritano, LLP Ten Winthrop Square Boston, MA 02110	

Subscribed under the penalties of perjury.


Nancy Frankel Pelletier, Esq.